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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

United States of America,

Plaintiff,

v.

D-1 Mustapha Karaky,

Defendant.

Case:2:20-cr-20003

Judge: Edmunds, Nancy G.

MJ: Stafford, Elizabeth A.

Filed: 01-03-2020 At 10:04 AM

INFO USA V. KARAKY (DA)

Violation:

18 U.S.C. § 287 (False, Fictitious or  
Fraudulent Claims)

**INFORMATION**

THE UNITED STATES ATTORNEY CHARGES

**COUNT ONE**

**18 U.S.C. § 287 – False, Fictitious or Fraudulent Claims**

D-1 Mustapha Karaky

1. From on or about November 3, 2014, to on or about November 17, 2014, in the Eastern District of Michigan, and elsewhere, the defendant, Mustapha Karaky, did make and present to the United States Department of Homeland Security, Federal Emergency Management Agency (FEMA), a claim for disaster assistance that the defendant knew was false, fictitious, and fraudulent.

2. Specifically, on or about September 30, 2014, defendant electronically submitted a FEMA application for disaster assistance, claiming that a sewer backup caused damage to his home in the Eastern District of Michigan. On or

about October 3, 2014, FEMA sent a letter to defendant awarding certain disaster assistance. FEMA determined, however, that the sewer back up did not cause defendant's home to be unsafe to live in. As a result, FEMA denied the defendant's request for rental assistance.

3. On or about November 5, 2014, the defendant mailed an appeal claim letter to FEMA (dated November 3, 2014), falsely claiming that he (and his family) needed to move out of their home for about a month because of a family member's medical condition (thus requiring rental assistance). Defendant knew the representations made in the claim were untrue. Defendant made the false representations in order to obtain rental assistance from FEMA.

4. As a direct and foreseeable result of the false representations made by defendant, FEMA awarded additional monetary disaster rental assistance to the defendant pursuant to his claim.

All in violation of Title 18, United States Code, Section 287.

### **FORFEITURE ALLEGATION**

5. Pursuant to Fed. R. Cr. P. 32.2(a), the government hereby provides notice to the defendant of its intention to seek forfeiture of all proceeds, direct or indirect, or property traceable thereto, all property that facilitated the commission of the violations alleged, or property traceable thereto, and all property involved in, or property traceable thereto, of the violations set for in this Information.

6. Substitute Assets: If the property described above as being subject to forfeiture, as a result of any act or omission of Defendant:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third party;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property that cannot be divided without difficulty;

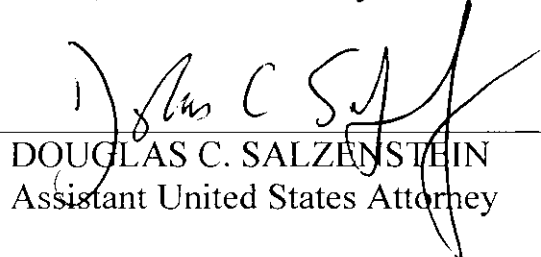
the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c).

MATTHEW SCHNEIDER  
United States Attorney



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MICHAEL C. MARTIN  
Chief, National Security Unit



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DOUGLAS C. SALZENSTEIN  
Assistant United States Attorney

Dated: January 3, 2020

Case:2:20-cr-20003

Judge: Edmunds, Nancy G.

MJ: Stafford, Elizabeth A.

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INFO USA V. KARAKY (DA)

United States District Court  
Eastern District of Michigan

Criminal Case Cover

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately.

<b>Companion Case Information</b>	<b>Companion Case Number:</b>
This may be a companion case based on LCrR 57.10(b)(4) <sup>1</sup> :	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>AUSA's Initials:</b> <i>DS</i>

Case Title: USA v. Mustapha Karaky ✓County where offense occurred: Wayne

Offense Type: Felony ✓

Information -- no prior complaint

**Superseding Case Information**

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

Reason: \_\_\_\_\_

Defendant NameChargesPrior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case

1/3/2020

Date

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<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.